

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

UNITED STATES OF AMERICA,

vs.

JOSE NAPOLEAN LICONA-SERRANO,
Defendant.

DOCKET NO. 3:25-CR-38-MOC

**UNOPPOSED MOTION TO EXTEND
PRESENTENCE REPORT
OBJECTION DEADLINE**

Jose Napoleon Licona-Serrano, by and through his counsel of record, Assistant Federal Defender John Parke Davis, respectfully requests that this Court continue the Presentence Report Objection deadline. As grounds therefore, it is averred:

1. On March 27, 2025, Mr. Licona-Serrano pled guilty to a one-Count Bill of Indictment charging him with illegal reentering the country following deportation, pursuant to 8 U.S.C. § 1326. Mr. Licona-Serrano pled guilty without a written plea agreement.

2. On May 16, 2025, the Draft Presentence Report (Doc. 16) was filed in this case. The Presentence Report Objection deadline was May 30, 2025.

3. Undersigned counsel was out of the office on annual leave from May 24th until June 2, 2025, and needs additional time to investigate and research issues raised by the Draft Presentence Report.

4. The Probation Office currently requires the filing of a written motion for parties to receive an extension of the Presentence Report Objection deadline.

5. Thus, defense counsel requests until June 9, 2025 to file any Presentence Report Objections for Mr. Licona-Serrano.

6. The government does not oppose the granting of this motion.

WHEREFORE, Mr. Licona-Serrano respectfully requests an extension of the Presentence Report Objection deadline until June 9, 2025.

Respectfully submitted:

s/ John Parke Davis
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DATE: June 2, 2025